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7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 MONTREL LEVESTER MONTGOMERY,
DANIELLE PARTINGTON
15 Defendants.

Case No. 2:21-mj-00687-EJY

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Second Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Peter S. Levitt, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Keisha
20 K. Matthews, Assistant Federal Public Defender, counsel for Montrel Levester Montgomery,
21 and Michael J. Miceli, Esq. counsel for defendant Danielle Partington that the Preliminary
22 Hearing currently scheduled on March 9, 2022, be vacated and continued to a date and time
23 convenient to the Court, but no sooner than sixty (60) days.

24 This Stipulation is entered into for the following reasons:

25 1. Parties have entered negotiations and need the additional time to resolve this
26 matter.

2. Mr. Montgomery and Ms. Partington are not incarcerated and do not object to a continuance.

3. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the second request for continuance filed herein.

DATED this 7th day of March, 2022.

RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Keisha K. Matthews
By _____
KEISHA K. MATTHEWS
Assistant Federal Public Defender

/s/ Peter S. Levitt
By _____
PETER S. LEVITT
Assistant United States Attorney

/s/ Michael J. Miceli
By _____
MICHAEL J. MICELI, ESQ.
Counsel for Danielle Partington

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4 Plaintiff,

5 v.

6 MONTREL LEVESTER MONTGOMERY,
7 DANIELLE PARTINGTON
8 Defendants.

Case No. 2:21-mj-00687-EJY

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,
11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on March
12 9, 2022 at the hour of 4:00 p.m., be vacated and continued to May 9, 2022 at the hour of
13 4:00 p.m. in a courtroom to be determined.

14 DATED this 7th day of March, 2022.

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17 UNITED STATES MAGISTRATE JUDGE